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## UNITED STATES DISTRICT COURT

## DISTRICT OF NEVADA

RON SCHRECKENGOST, an individual, and ELIZABETH WALSH, an individual,

Plaintiff,

VS.

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THE STATE OF NEVADA ex rel. the NEVADA DEPARTMENT OF CORRECTIONS; and PERRY RUSSELL, an individual.

Defendants.

CASE NO: 3:19-cv-00659-MMD-CLB

STIPULATION, REQUEST, AND [PROPOSED] ORDER ENLARGING TIME FOR PLAINTIFFS TO RESPOND TO **DEFENDANTS' MOTION TO SEVER** (ECF 020)

(First Request)

The parties to this action, by and through their undersigned counsel of record hereby stipulate that Plaintiffs may have a two (2)-week extension of time, from the date of the Early Neutral Evaluation ("ENE") Conference scheduled for April 8, 2020, through and including Wednesday, April 22, 2020, to file their opposition to Defendants' Motion to Sever Misjoined Plaintiff, Elizabeth Walsh (ECF 020). Pursuant to this stipulation, the parties hereby request that the Court grant this enlargement of time. This is the first request for such an extension. The original deadline to file this opposition brief is Thursday, March 19, 2020, which deadline has not yet run. The reason that additional time is requested here is to permit the parties to allocate and conserve their resources relating to the ENE Conference, including in the submission of their separate written evaluation statements for the same, on the potential settlement of this case at the ENE Conference. Should the case not settle at the ENE Conference, then the briefing schedule on this motion would resume, with Plaintiffs having two weeks to file an opposition brief, by Wednesday, April 22, 2020.

1 This stipulation and request are not made for any dilatory or improper purpose. 2 3 THE GEDDES LAW JIRM, P.C. Dated this 10th Day of March. 4 5 WILLIAM J. GEDDES 6 Nevada Bar Number 6984 The Geddes Law Firm, P.C. 7 8600 Technology Way, Suite 107 Reno, Nevada 89521 8 (775) 853-9455 Attorneys for Plaintiffs Ron 9 Schreckengost and Elizabeth Walsh 10 11 Dated this 10th Day of March. AARON D. FORD Nevada Attorney General 12 Electronic Signature Authorized 13 /s/ Brandon R. Price 14 BRANDON R. PRICE Senior Deputy Attorney General 15 Nevada Bar No. 11686 SCOTT H. HUSBANDS 16 Deputy Attorney General Nevada Bar No. 11398 17 State of Nevada Office of the Attorney General 18 5420 Kietzke Lane, Suite 202 Reno, NV 89511 (775) 687-2121 (phone) 19 Attorneys for Defendants, State of 20 Nevada ex rel. its Department of Corrections and 21 Perry Russell 22 23 **ORDER** 24 25 Dated: April 1, 2020 IT IS SO ORDERED 26 27 28 CHIEF UNITED STATES DISTRICT JUDGE

# The Geddes Law Firm, P.C. 8600 Technology Way, Suite 107 Reno, NV 89521 Phone 775-853-9455

## **CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of the Geddes Law Firm, P.C., and that on <u>March 10</u>, <u>2020</u>, I caused to be served a copy of the foregoing *Stipulation, Request, and [Proposed] Order Enlarging Time for Plaintiffs to Respond to Defendants' Motion to Sever Misjoined Plaintiff, Elizabeth Walsh* (ECF 020) (*First Request*), by filing the same with the Court's electronic filing system (PACER), addressed to the following:

AARON D. FORD

Nevada Attorney General

BRANDON R. PRICE

Senior Deputy Attorney General

SCOTT H. HUSBANDS

Deputy Attorney General

State of Nevada Office of the Attorney General

5420 Kietzke Lane, Suite 202

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Attorneys for Defendants, State of Nevada ex rel. its Department of Corrections and Perry Russell

Alexan Cester
WILLIAM J. GEDDES

An employee of the Geddes Law Firm, P.C.